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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case
No. 19 -30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF JOE ECHOLS IN
SUPPORT OF CPSI REDACTION MOTION**

[No Hearing Requested]

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric
Company
☐ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

1 I, Joe Echols, pursuant to section 1746 of title 28 of the United States Code, hereby declare under
2 penalty of perjury that the following is true and correct to the best of my knowledge, information, and
3 belief:

4 1. I am a Manager, Encroachment Management, in the Land Department at Pacific
5 Gas and Electric Company (the “Utility” and, together with PG&E Corporation, the “Debtors”). I joined
6 the Utility in 2010 and held a number of positions in the Utility, including Manager, Land Department
7 & Community Pipeline Safety Initiative, and Supervisor, Land Department. I am a certified Senior Right
8 of Way professional.

9 2. I am knowledgeable and familiar with the Utility’s day-to-day operations and,
10 specifically, the Utility’s Community Pipeline Safety Initiative (the “CPSI”) program. I am authorized
11 to submit this Declaration (the “Declaration”) on behalf of the Debtors in support of the *Motion to*
12 *Redact Documents Filed in Support of CPSI Agreement Assumption Motion* (the “Redaction Motion”).
13 The facts set forth in this Declaration are based upon my personal knowledge, my review of relevant
14 documents, and information provided to me by the Debtors’ other employees or the Debtors’ legal,
15 restructuring, and financial advisors. If called upon to testify, I would testify to the facts set forth in this
16 Declaration.

17 3. The background to the CPSI Program is set out in my declaration submitted in
18 support of the *Second Omnibus Motion of the Debtors Pursuant to 11 U.S.C § 365(a), Fed. R. Bankr. P.*
19 *6006, and B.L.R. 6006-1 (i) Approving the Utility’s Assumption of Contracts in Connection with the*
20 *Community Pipeline Safety Initiative and (ii) Granting Related Relief* (the “Motion”).¹

21 4. As set forth in the Motion, the Debtors are seeking authority to assume certain
22 agreements entered into with landowners in connection with the CPSI program, which agreements
23 provide the Utility necessary access to land on which the Utility’s gas transmission pipelines are located
24 to carry out critical vegetation removal and other clearing projects. The projects carried out as part of
25 the CPSI program occasionally require that trees and other vegetation be cleared or otherwise removed
26 to ensure the Utility and emergency services providers can access the Utility’s gas transmission

27 ¹ Capitalized terms used but not otherwise herein defined shall have the meanings ascribed to such terms
28 in the Motion.

1 pipelines, making the program a potential target of activists in the communities in which the projects
2 are carried out. On several occasions in the past, the publicly disclosed information of participants in
3 the CPSI program has been used by activists to make unsolicited contact with those property owners in
4 an effort to discourage them from participating in the CPSI program.

5 5. I believe that if the Personal Information (as defined in the Redaction Motion) is
6 not redacted from documents relating to the CPSI Program filed publicly with the Bankruptcy Court,
7 activists could use the information to contact the counterparties and attempt to undermine the CPSI
8 program. Accordingly, the limited redactions sought in the Redaction Motion are reasonable,
9 appropriate, and in the best interests of the public.

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11 *[Remainder of this page is intentionally left blank]*
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Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information, and belief, and that this declaration was executed at San Ramon, California on July 24, 2019.

/s/ Joe Echols

Joe Echols